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Executive Committee for Class Plaintiffs

November 4, 2019

**RE: *In re FLINT WATER CASES*, Civil Action No. 5:16-cv-10444-JEL-MKM
Carthan et. al. v. Governor Rick Snyder et. al., Civil Action 5:16-cv-10444-
JEL-MKM**

Dear Counsel:

Pursuant to Deposition Protocol contained within the Second Amended Case Management Order as well as the Confidentiality Order and Addendum to the Confidentiality Order related to the Production of Medical, Educational, Insurance, Employment and Government records of Plaintiffs, the undersigned attorneys for the Defendants, Veolia Water North America Operating Services, LLC, Veolia North America, Inc. and Veolia North America, LLC (collectively "the VNA Defendants) hereby submit the list of exhibits we may use at class plaintiff's, Barbara Davis, deposition, currently scheduled on November 11 and 12, 2019.

This list includes:

- 1) The Fourth Amended Complaint;
- 2) Written discovery responses of plaintiff, Barbara Davis, including:
 - a. Ms. Davis's Responses to Defendants' First Set of Uniform Interrogatories;
 - b. Ms. Davis's Amended and Supplemental Responses to Defendants' First Set of Uniform Interrogatories;
 - c. Ms. Davis's Responses to VNA Defendants' First Request for Production of Documents;
 - d. Ms. Davis's Responses to VNA Defendants' Second Request for Production of Documents;
 - e. Ms. Davis's Amended Responses to VNA's Second Request for Production of Documents;
 - f. Ms. Davis' Second Amended Responses to VNA's Second Request for Production of Documents;
 - g. Ms. Davis's Responses to Defendant, Lockwood, Andrews & Newman, Inc. (LAN), Request for Production of Documents;
 - h. Ms. Davis's Amended Responses to Defendant, LAN, Request for Production of Documents;
 - i. Ms. Davis's Confidentiality Addendum to Ms. Davis's Amended and Supplemental Responses to Defendants' First Set of Uniform Interrogatories.
- 3) Medical records produced by class plaintiff, Barbara Davis, in response to Defendants' Uniform Interrogatories and Requests for Production of Documents, Barbara-&-Darrell-Davis_000048-000101, 000503-000594;
- 4) Additional records produced in response to Defendants' Request for Production of Documents, Barbara-&-Darrell-Davis_000001-000032, 000102-000195, 000410-000491, 000595-000656;
- 5) Any and all medical records pertaining to class plaintiff, Barbara Davis, received via subpoena and medical authorization. These medical providers have been identified in a separate exhibit and provided to the appropriate parties in accordance with the Confidentiality Order entered in this matter.

Thank you for your attention.

Very truly yours,

A handwritten signature in black ink, appearing to read "John J. O'Donnell", written in a cursive style.

John J. O'Donnell
Alaina Devine

cc: Wayne Mason
Phil Erickson
Krista Jackson
Sheldon Klein
William Kim
Rick Berg
Chris Clare
Jim Fajen

Exhibit A

- 1) Medical records and school records obtained via subpoena and authorization for the following providers:
 - a. Flint Community Schools, Restricted Distribution-Confidential-BDavis-FCS-HR-540001-000001 – 000324;
 - b. Flint OBGYN, Restricted Distribution-Confidential-B-Davis-FOBGYN-MD-540001-000001 – 000049;
 - c. Gaffney and Karlene Dermatology, Restricted Distribution-Confidential-BDavis-GKD- 540001-000002;
 - d. Genesee Community Health Center, Restricted Distribution-Confidential-BDavis-GCHC-MD-540001-000001 – 000002;
 - e. Genesys Dort Medical Physical Therapy, Restricted Distribution-Confidential-BDavis-GDMPT-540001-000001;
 - f. Grambling State University, Restricted Distribution-Confidential-BDavis-GSU-RO-540001 – 000054;
 - g. Marygrove College, Restricted Distribution-Confidential-BDavis-MC-RO-540001-000001 – 000016;
 - h. Dr. Damayanthi V. Pandrangi, Restricted Distribution-Confidential-BDavis-DVPandrangi-540001-000001 - 210

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Executive Committee for Class Plaintiffs

October 31, 2019

**RE: *In re FLINT WATER CASES*, Civil Action No. 5:16-cv-10444-JEL-MKM
Carthan et. al. v. Governor Rick Snyder et. al., Civil Action 5:16-cv-10444-
JEL-MKM**

Dear Counsel:

Pursuant to Deposition Protocol contained within the Second Amended Case Management Order as well as the Confidentiality Order and Addendum to the Confidentiality Order related to the Production of Medical, Educational, Insurance, Employment and Government records of Plaintiffs, the undersigned attorneys for the Defendants, Veolia Water North America Operating Services, LLC, Veolia North America, Inc. and Veolia North America, LLC (collectively "the VNA Defendants) hereby submit the list of exhibits we may use at class plaintiff's, Darrell Davis, deposition, currently scheduled on November 7 and 8, 2019.

This list includes:

- 1) The Fourth Amended Complaint;
- 2) Written discovery responses of plaintiff, Darrell Davis, including:
 - a. Mr. Davis's Responses to Defendants' 1st Set of Uniform Interrogatories;
 - b. Mr. Davis's Responses to VNA Defendants' Request for Production of Documents;
 - c. Mr. Davis's Amended Responses to VNA's Request for Production of Documents;
 - d. Mr. Davis's Responses to Defendant, Lockwood, Andrews & Newman, Inc. (LAN), Request for Production of Documents;
 - e. Mr. Davis's Amended Responses to Defendant, LAN, Request for Production of Documents;
 - f. Mr. Davis's Confidentiality Addendum to Defendants' First Set of Uniform Interrogatories.
- 3) Medical records produced by class plaintiff, Darrell Davis, in response to Defendants' Uniform Interrogatories and Requests for Production of Documents, Barbara-&-Darrell-Davis_000196-000409;
- 4) Additional records produced in response to Defendants' Request for Production of Documents, Barbara-&-Darrell-Davis_000015, 000106-000114, 000138-000140, 000161-000195, 000416-000450;
- 5) Any and all medical records pertaining to class plaintiff, Darrell Davis, received via subpoena and medical authorization. These medical providers have been identified in a separate exhibit and provided to the appropriate parties in accordance with the Confidentiality Order entered in this matter.

Thank you for your attention.

Very truly yours,

A handwritten signature in blue ink, appearing to read "J. J. O", with a stylized flourish at the end.

John J. O'Donnell
Alaina Devine

cc: Wayne Mason
Phil Erickson
Krista Jackson
Sheldon Klein
William Kim
Rick Berg
Chris Clare
Jim Fajen

Exhibit A

- 1) Medical records obtained via subpoena and authorization for the following providers:
 - a. Ascension Medical Group Genesys, Restricted Distribution-Confidential-DDavis-AMGG-540002-000001 – 540002-000268;
 - b. Comprehensive Pain Specialists, Restricted Distribution-Confidential-DDavis-CPS-540002-000001 – 540002-000001;
 - c. Fireberg Family Dental, Restricted Distribution-Confidential-DDavis-FireFD-540002-000001 – 540002-000015;
 - d. Flushing Road Internal Medicine and Pediatrics, Restricted Distribution-Confidential-DDavis-FRIMP-MD-540002-000001 – 540002-000065;
 - e. Genesee County Community Health Center, Restricted Distribution-Confidential-DDavis-GCCHC-MD-540002-000001 – 540002-000001;
 - f. Hurley Medical Center, Restricted Distribution-Confidential-DDavis-HurleyMC-MD-540002-000001 – 540002-000132;
 - g. Quest Diagnostics, Restricted Distribution-Confidential-DDavis-QD-MD-540002-000001 – 540002-000027.